

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

MASS ENGINEERED DESIGN, INC.

Plaintiff

v.

PLANAR SYSTEMS, INC.

Defendant

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Civil Action No. 6:14-cv-00414-LED

JURY TRIAL DEMANDED

PLAINTIFF’S ANSWER TO DEFENDANT’S COUNTERCLAIMS

Plaintiff, Mass Engineered Design, Inc. (“Mass”), by and through its undersigned counsel hereby answer the counterclaims of Defendant, Planar Systems, Inc. (“Planar”), and states as follows:

GENERAL COUNTERCLAIM ALLEGATIONS

1. Admitted.
2. Admitted.

JURISDICTION AND VENUE

3. Admitted that this Court and the District of Oregon have jurisdiction over Planar’s alleged counterclaims. Mass denies that Planar’s declaratory claims have any merit and further denies that Planar is entitled to any declaratory relief.

4. Admitted that this Court has personal jurisdiction over Mass. Denied that the District of Oregon has personal jurisdiction over Mass. The remainder of the allegations of this paragraph are not fairly amenable to admission or denial. Mass denies the remainder of the allegations of Paragraph 4.

5. Admitted that this Court has entered an Order stating that it intends to transfer this case to the District of Oregon upon issuance of this Court's claim construction order. Admitted that Mass did not dispute that venue would be proper in Oregon. Admitted that Planar contends that venue is improper in this District. Mass denies that venue is improper in this District. Mass denies the remainder of the allegations in Paragraph 5.

6. Admitted that Mass has alleged infringement by Planar of the Patents-in-Suit and that an actual and justiciable controversy exists between Mass and Planar. Denied that Planar is entitled to any relief in conjunction with such controversy.

COUNT I

7. Mass incorporates here its answers and responses to Planar's previous allegations.

8. Denied.

9. Denied.

COUNT II

10. Mass incorporates here its answers and responses to Planar's previous allegations.

11. Denied.

12. Denied.

PRAYER FOR RELIEF

Mass denies that Planar is entitled to any of the relief that Planar seeks in its prayer.

JURY DEMAND

Mass acknowledges that Planar has made a jury demand. Mass has likewise requested a trial by jury on all issues so triable.

Date: May 1, 2015

Respectfully submitted,

By: /s/ Stephen F. Schlather
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*Attorneys for Plaintiff
Mass Engineered Design, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

Date: May 1, 2015

/s/ Stephen F. Schlather
Stephen F. Schlather